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*Attorneys for Plaintiff U.S. Bank
N.A., successor trustee to Bank of
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to LaSalle Bank N.A., on behalf of
the registered holders of Bear
Stearns Asset Backed Securities I
LLC, Asset-Backed Certificates,
Series 2005-HE6*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

U.S. BANK N.A., SUCCESSOR
TRUSTEE TO BANK OF AMERICA,
N.A., SUCCESSOR IN INTEREST TO
LASALLE BANK N.A., ON BEHALF OF
THE REGISTERED HOLDERS OF BEAR
STEARNS ASSET BACKED
SECURITIES I LLC, ASSET-BACKED
CERTIFICATES, SERIES 2005-HE6,

Plaintiff,

vs.

TERRAFIRMA VENTURE LLC, a Nevada
corporation; TREASURES LANDSCAPE
MAINTENANCE ASSOCIATION, a
Nevada non-profit corporation,

Defendants.

Case No. 2:17-cv-01890-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND BRIEFING SCHEDULE
ON TREASURES LANDSCAPE
MAINTENANCE ASSOCIATION'S
MOTION TO DISMISS OR, IN THE
ALTERNATIVE, MOTION FOR
SUMMARY JUDGMENT (ECF NOS.
57 AND 58)**

(FIRST REQUEST)

Plaintiff U.S. Bank NA, Successor Trustee to Bank of America, NA, Successor
in Interest to LaSalle Bank, N.A., on behalf of The Registered Holders of Bear
Stearns Asset Backed Securities I LLC, Asset-Backed Certificates, Series 2005-HE6

1 (the “Trust”), and Defendant Treasures Landscape Maintenance Association
2 (“Treasures”), (collectively the “Parties”), by and through their respective
3 undersigned counsel of record, hereby stipulate and agree as follows. November 27,
4 2018 and December 4, 2018 are the current, respective deadlines for the Trust to
5 respond to Treasures Landscape Maintenance Association’s Motion to Dismiss, or in
6 the Alternative, Motion for Summary Judgment (ECF Nos. 57 and 58, filed
7 November 13, 2018, the “Motions”).

8 In an effort to allow settlement negotiations between the Parties to this
9 Stipulation to proceed (where the Trust and Defendant Terrafirma Venture LLC
10 have already reached an agreement in principle), the Parties stipulate and agree
11 that the Trust has up to and including January 11, 2019 to respond to the Motion.
12 The amount of time requested is necessary, as even though the Parties will pursue
13 settlement with the utmost diligence, it may take the considerable additional time
14 to secure the requisite approvals, due to limiting factors such as when Board
15 meetings are held, etc.

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1 The parties submit this stipulation in good faith and not for purposes of
2 delay.

3 Dated: November 27, 2018

4 BALLARD SPAHR LLP

LIPSON, NEILSON, COLE, SELTZER &
GARIN, P.C.

6 /s/ Justin A. Shiroff

/s/ Lisa J. Zastrow

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12 *Attorneys for Plaintiff*

*Attorneys for Defendant, Treasures
Landscape Maintenance Association*

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16 IT IS SO ORDERED.

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20 United States District Judge

21 DATED: November 30, 2018
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